

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED  
APR 3 5 01 PM '00  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS MEEHAN TO INTERROGATORIES OF  
ADVO, INC.  
(ADVO/USPS-T11-4 and 5)

The United States Postal Service hereby provides the responses of witness Meehan to the following interrogatories of Advo, Inc.: ADVO/USPS-T11-4 and 5, filed on March 20, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990 Fax -5402  
April 3, 2000

**Response of United States Postal Service Witness Meehan  
to  
Interrogatories of ADVO, Inc.**

**ADVO/USPS-11-4. Please refer to your Base Year 1998 (USPS Version) Letter Carrier Route Worksheet 7.0.4.1. Please confirm that the following table accurately reflects the accrued cost factors shown in that worksheet for the following route types (note that "Foot" combines business, residential, and mixed foot routes). If you cannot confirm, please provide the correct figures.**

	FOOT	BUS. MOT.	RES. CURB	RES. P&L	MIX CURB	MIX P&L
Load	49.35%	30.59%	47.64%	35.27%	35.61%	33.22%
Street Support	15.23%	16.77%	18.54%	17.79%	17.82%	12.81%
Driving Time	2.16%	27.94%	8.85%	11.23%	20.09%	18.59%
Route/Access (FAT)	32.51%	20.00%	9.30%	33.20%	20.34%	32.88%
Route/Access (CAT)	0.44%	4.70%	15.59%	2.22%	5.43%	2.27%
Collection	0.31%	0.00%	0.08%	0.29%	0.71%	0.23%
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

**Response:**

Confirmed.

Response of United States Postal Service Witness Meehan  
to  
Interrogatories of ADVO, Inc.

**ADVO/USPS-T11-5.** Please refer to the Base Year 1996 (USPS Version) Letter Carrier Route Worksheet 7.0.4.1 of USPS witness Alexandrovich, USPS-T-5, in Docket R97-1. Please confirm that the following table accurately reflects the accrued cost factors shown in that worksheet for the following route types (note that "Foot" combines business, residential, and mixed foot routes). If you cannot confirm, please provide the correct figures.

	FOOT	BUS. MOT.	RES. CURB	RES. P&L	MIX CURB	MIX P&L
Load	44.98%	15.69%	37.05%	19.78%	26.14%	24.53%
Street Support	13.32%	17.02%	13.98%	16.58%	18.23%	17.42%
Driving Time	1.93%	20.40%	6.43%	7.33%	7.95%	11.76%
Route/Access (FAT)	37.54%	38.40%	10.65%	49.43%	28.38%	36.73%
Route/Access (CAT)	1.46%	3.79%	31.51%	5.95%	17.04%	6.74%
Collection	0.76%	4.70%	0.38%	0.93%	2.26%	0.82%
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

**Response:**

Confirmed.

## DECLARATION

I, Karen Meehan, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Karen Meehan

4/3/00

---

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990 Fax -5402  
April 3, 2000